

EXHIBIT 4

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF JOSEPH M.
EARLEY III REGARDING WILLIAM B.
ABRAMS MOTION TO DESIGNATE
IMPROPERLY SOLICITED VOTES
PURSUANT TO 11 U.S.C. §1125(B) AND
1126(E) AND BANKRUPTCY RULE 2019**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Date: May 12, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Docket No. 6799, 6964, 6963

DECLARATION OF JOSEPH M. EARLEY III

Joseph M. Earley III declares the following pursuant to 28 U.S.C. § 1746:

1. I am an attorney licensed to practice law in California. I have owned and operated the Law Office of Joseph M. Earley in Paradise, CA until my office burned in the Camp Fire. I run my practice in Chico, CA until I am able to rebuild my home and office in Paradise.
2. I currently represent approximately 10,000 clients within the Watts Guerra group concerning the wildfires subject to the proposed settlement.
3. My family and I are also clients of Watts Guerra given we lost our home and possessions in the CAMP Fire.

4. Since March 2019, I've sent out weekly updates to my client group. The updates concerned the progress of the litigation, information concerning the claim process, requests for supporting documentation and encouragement given the stress all who were affected by the wildfires were going through.

5. At no time did I tell any client of mine how they must vote. As their lawyer and a fellow claimant I have recommended they accept the settlement because that is my professional judgment, but the decision on how to vote has always been the clients to make. I have always explained the reasons why I recommend that my clients vote to accept.

6. I invited every client of ours to attend telephone town halls our group held weekly through the month of April plus three additional town halls in May prior to the close of the vote.

7. Prior to the COVID-19 fueled shut down, we also held in-person client community forums to inform all of our clients about the proposed settlement.

8. Since the Shelter in Place orders, our group has facilitated several "Telephone Town Hall" meetings and provided settlement information, disclosures and references to www.firesettlementfacts.com where all of the settlement information plus Q&A was situated.

9. These telephone town halls became open to the general interested public and featured questions asked by anyone attending the town hall call. The questions were answered by either a member of our group or from one of the other legal groups whose clients were also attending the town hall.

10. As set forth in Mikal Watts' declaration, many thousands of people attended these town halls.

11. The audio and transcripts of each town hall were provided to my clients via a link in my weekly client updates.

I declare under penalty of perjury under the laws of the United States and the State of California that the forgoing is true and correct and executed this 8thth day of May 2020.

Dated May 8, 2020

Respectfully submitted,

/s/ Joseph M. Earley III
Joseph M. Earley III